

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|----------------------------------|---|---------------------------|
| MUSTAFA ABDULLAH, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | CASE NO. 4:14-cv-1436 CDP |
| |) | |
| COUNTY OF SAINT LOUIS, MISSOURI, |) | |
| et al., |) | |
| |) | |
| Defendants. |) | |

Motion for Leave to Supplement

Comes now Plaintiffs and move for leave to supplement their pending motion for attorneys' fees and expenses. Doc. # 69. In support, they state:

1. Pending before this Court is Plaintiffs' motion for attorneys' fees and expenses. Doc. # 69.
2. Plaintiffs' motion requests an award of fees at an hourly rate of \$350.00 for Anthony Rothert. Doc. # 70, at pp. 13, 16.
3. In his opposition, the Director of the Missouri Highway Patrol urges that Mr. Rothert's hourly rate should be \$300.00. Doc. # 73, at pp. 10-11.
4. On June 5, 2015, the United States District Court for the Western District of Missouri found that an hourly rate of \$365.00 for Mr. Rothert is reasonable. *Kennard v. Kleindienst*, No. 2:14-CV-04017-BCW (W.D. Mo.). A copy of the decision is attached.
5. On July 1, 2015, the United States District Court for the Eastern District of Missouri also awarded attorneys' fees at hourly rate of \$365.00 for Mr. Rothert. *Survivors Network of Those Abused by Priests, Inc. v. Joyce*, No. 4:12CV01501 ERW, 2015

WL 4042143, at *1 (E.D. Mo. July 1, 2015). Notably, in that case, the Attorney General argued that “more reasonable rates are \$325.00 per hour for Mr. Rothert”

Id. A copy of the decision is attached.

6. These two recent decisions may aid this Court in resolving the pending motion for attorneys’ fees and expenses.

WHEREFORE Plaintiffs request this Court grant him leave to supplement his motion for attorneys’ fees and expenses with the two attached cases.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

Certificate of Service

I certify that on July 6, 2015, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Anthony E. Rothert